

LEVIN-EPSTEIN & ASSOCIATES, P.C.

60 East 42nd Street • Suite 4700 • New York, New York 10165
T: 212.792.0048 • E: Jason@levinepstein.com

February 12, 2024

VIA ECF

The Honorable Jennifer L. Rochon, U.S.D.J.
U.S. District Court, Southern District of New York
500 Pearl Street, Room 1920
New York, NY 10007

Re: *Nguyen v. Pho Vietnam 87 Corporation et al*
Case No.: 1:23-cv-04298-JLR

Dear Honorable Judge Rochon:

This law firm represents Plaintiff Hung Nguyen (the “Plaintiff”) in the above-referenced matter.

Pursuant to Your Honor’s Individual Motion Practice Rules, this letter respectfully serves to request an extension of time to file Plaintiff’s Motion for Default Judgment from February 12, 2024 to, through and including, March 15, 2024.

This is the second request of its kind. If granted, this request would not affect any other Court-ordered scheduled deadlines.

The basis of this request is that the undersigned law firm is still in the process of gathering additional information from Plaintiff, in support of the Motion for Default Judgment.

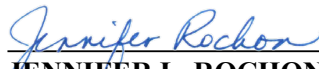
In light of the foregoing, it is respectfully requested that the Court extend the deadline to file Plaintiff’s Motion for Default Judgment from February 12, 2024 to, through and including, March 15, 2024.

We thank the Court for its attention to this matter, and are available at the Court’s convenience to answer any questions related to the foregoing.

The request is **GRANTED**. The motion for default judgment shall be due by **March 15, 2024**. However, Plaintiff should not expect further extensions of this deadline absent good cause.

Dated: February 12, 2024
New York, New York

SO ORDERED.


JENNIFER L. ROCHON
United States District Judge

VIA ECF: All Counsel

Respectfully submitted,

LEVIN-EPSTEIN & ASSOCIATES, P.C.

By: /s/ Jason Mizrahi

Jason Mizrahi
60 East 42nd Street, Suite 4747
New York, NY 10170
Tel. No.: (212) 792-0048
Email: Jason@levinepstein.com
Attorneys for Plaintiff